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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	CR 17-00191-JST
14 Plaintiff,)	
15 v.)	STIPULATION AND PROPOSED ORDER TO
16 KENNETH TAYLOR,)	EXCLUDE TIME UNDER THE SPEEDY
17 SHARON RINGGENBERG, and)	TRIAL ACT AS TO ALL DEFENDANTS
18 CRAIG SCOTT,)	
19 Defendants.)	

20 The parties hereby STIPULATE and AGREE as follows:

21 1. On April 14, 2017, a federal grand jury in the Northern District of California returned a
22 five-count Indictment alleging that Defendants Kenneth Taylor, Sharon Ringgenberg, and Craig Scott
23 conspired to and did commit wire fraud with respect to a business providing fraudulent standby letters of
24 credit and proof of funds statements, in violation of 18 U.S.C. §§ 1343 and 1349, and that Kenneth
25 Taylor signed and filed false 2009 and 2010 federal income tax returns in which he failed to report
26 income from the fraud scheme, in violation of 26 U.S.C. § 7206(1).

27 2. On May 22, 2017, the Court issued a Protective Order regarding the discovery materials
28 that the government plans to serve on Defendants. *See* Doc. No. 17.

1 3. On May 25, 2017, the government served initial discovery on all defendants. The
2 government estimates that this production contains in excess of 70,000 pages of documents.

3 4. On May 26, 2017, Kenneth Taylor and Craig Scott, represented by their respective
4 counsel, and the government, represented by Assistant U.S. Attorney Colin Sampson, appeared for an
5 initial status hearing before United States District Judge Jon S. Tigar. The matter was continued to July
6 21, 2017, in order for counsel to review recently-produced discovery.

7 5. On July 17, 2017, the United States made an additional production of several thousand
8 additional pages of documents to defendants.

9 6. On July 21, 2017, all defendants appeared at a status conference in this matter. A further
10 status conference was scheduled for September 29, 2017, for counsel to continue reviewing discovery
11 and for the government to produce electronic discovery materials that have not yet finished processing.

12 7. On September 22, 2017, the United States made productions to defendants of
13 approximately 100,000 pages of discovery as well as audio recordings.

14 8. On September 29, 2017, all defendants appeared at a status conference in this matter. A
15 further status conference was scheduled for January 12, 2018, at which the parties expect to set a
16 briefing and trial schedule. Time under the speedy trial act was excluded from September 29, 2017 to
17 January 12, 2018.

18 9. On December 6, 2017, lead counsel for Defendant Sharon Ringgenberg, James
19 Brosnahan, filed a Notice of Withdrawal in this case.

20 10. As a result of the withdrawal of Mr. Brosnahan as lead counsel for Defendant Sharon
21 Ringgenberg, and due to a scheduling conflict for current lead counsel Joshua Hill for Defendant Sharon
22 Ringgenberg on January 12, 2017, the parties jointly request a continuance of the status conference in
23 this matter from January 12, 2017, to February 9, 2017, the next available hearing date at which lead
24 counsel for defendants and the government are available.

25 11. For the reason that counsel for Defendants Kenneth Taylor, Sharon Ringgenberg, and
26 Craig Scott, require reasonable time for continuity of counsel and to allow for effective preparation, it is
27 hereby stipulated by and between Plaintiff, the United States of America, and Defendants, through their
28 counsel, as follows:

- 1 A. That a status conference in this matter is scheduled for February 9, 2018, at
2 9:30 a.m.; and,
- 3 B. That the period of delay from December 15, 2017 to February 9, 2018, shall be
4 excluded pursuant to 18 U.S.C. § 3161(h)(1)(F), (h)(7)(A) and (h)(7)(B)(iv) as the
5 ends of justice served by this exclusion allowing for continuity of counsel, and
6 effective preparation in this matter outweigh the best interest of the public and the
7 Defendants in a speedy trial.

8 Accordingly, the United States and Defendants Kenneth Taylor, Sharon Ringgenberg, and Craig
9 Scott, hereby STIPULATE AND AGREE that time under the Speedy Trial Act be excluded from
10 December 18, 2017, through February 9, 2018, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to
11 allow for effective preparation of counsel, taking into account the exercise of due diligence.

12 Respectfully submitted,

13 BRIAN J. STRETCH
14 United States Attorney

15 Dated: December 18, 2017.

/s/ Colin Sampson
 COLIN SAMPSON
 Assistant United States Attorney

17 Dated: December 18, 2017.

/s/ Martha Boersch
 MARTHA BOERSCH
 Attorney for Defendant Kenneth Taylor

19 Dated: December 18, 2017.

/s/ John Paul Reichmuth
 JOHN PAUL REICHMUTH
 Attorney for Defendant Craig Scott


21 Dated: December 18, 2017.

/s/ Joshua Hill, Jr.
 JOSHUA HILL, JR.
 Attorney for Defendant Sharon Ringgenberg

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IT IS ORDERED THAT the status conference currently scheduled for January 12, 2018, is rescheduled to February 9, 2018. It is further

IT IS SO ORDERED.


THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE